

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 ALINA N. MAMLYUK, #284154
amamlyuk@marshackhays.com
3 MARSHACK HAYS WOOD LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee,
RICHARD A. MARSHACK
7

8 Christopher B. Ghio (State Bar No. 259094)
Christopher Celentino (State Bar No. 131688)
9 Yosina M. Lissebeck (State Bar No. 201654)
DINSMORE & SHOHL LLP
10 655 West Broadway, Suite 800
San Diego, CA 92101
11 Telephone: 619.400.0500
Facsimile: 619.400.0501
12 christopher.ghio@dinsmore.com
christopher.celentino@dinsmore.com
13 yosina.lissebeck@dinsmore.com

14 Special Counsel to Richard A. Marshack

15 **UNITED STATES BANKRUPTCY COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

17 In re:

18 THE LITIGATION PRACTICE GROUP,
19 P.C.,

20 Debtor.
21
22

Chapter 11

Case No. 8:23-bk-10571-SC

**REPLY TO RESPONSE OF OHP-CDR,
LP AND PURCHASECO80, LLC TO
TRUSTEE'S MOTION FOR ORDER
DETERMINING AMOUNT OF
VARIOUS SECURED CLAIMS
[DKT NO. 924]**

Hearing

Date: February 28, 2024
Time: 1:30 p.m. (Pacific Time)
Judge: Hon. Scott C. Clarkson
Location: Courtroom 5C
411 West Fourth Street
Santa Ana, CA 92701

On February 7, 2024, Richard M. Marshack, Chapter 11 Trustee (“Trustee”), by and through his counsel, filed a Notice of Motion and Motion for Order Determining the Amount of Secured Claims, if Any, Held By Ten Different Entities Pursuant to Federal Rule of Bankruptcy Procedure 3012 (“Motion”) [Dkt. No. 924]. The Motion identified ten different entities that had UCC-1 statements of record against the Debtor as of the Petition Date and recited the actions taken to contact the filer/holder of each UCC-1 statement to determine if a claim still existed and/or to obtain a release of the UCC-1 statement if nothing was owed. As of February 20, 2024, none of the ten parties identified has filed a response or other objection to the Motion or has filed a proof of claim in advance of the February 24, 2024, bar date.

The only parties to file a response to the Motion were OHP-CDR, LP and Purchaseco80, LLC (collectively “OHP”) at Docket No. 938 (“Response”). OHP, however, was not identified as one of the entities subject to the relief requested in the Motion. As the Court is aware, OHP has filed an adversary against the Estate and creditor Azzure Capital, LLC (“Azzure”), Adversary No. 8-23-01098 (“Adversary”). A main purpose of the Adversary is to determine the priority of OHP’s filed UCC-1 vis-à-vis the UCC-1 originall filed by Cobalt but later assigned to Bae and then to Azzure.

The Motion is clear (i) that Cobalt Funding Solutions, LLC (“Cobalt”) had two UCC-1 Statements filed against the Debtor and (ii) that only the second UCC-1 Statement filed on July 6, 2021, attached to the Motion as Exhibit 6, is addressed in the Motion.

OHP’s Response, however, references a pleading from July 2023 to support a claim that Cobalt only filed one UCC-1 statement against the Debtor, which is at issue in the Adversary. OHP fails to understand the relevant facts. Cobalt has filed two separate UCC-1 statements against the Debtor that were unreleased as of the Petition Date. The Motion only addresses UCC Filing No. 210062497027 filed on July 6, 2021, by CT Corporation System (“CT Corp”) as agent for Cobalt Funding Solutions, LLC, which is not involved or implicated in the Adversary which involves UCC Filing No. 210050853928 filed on May 28, 2021, by CT Corp.

CLARIFICATION OF THE RECORD

CT Corp filed UCC Statement No. U210050853928 with the California Secretary of State against the Debtor on May 28, 2021 (“First Statement”). The First Statement was filed on behalf of

1 Cobalt, and in Proof of Claim No. 127, incorporated by reference herein, Azzure asserts that the First
2 Statement was assigned to it and secures its claim against the Debtor. From OHP's objection to the
3 Motion to Approve Compromise Between the Trustee and Azzure Capital LLC [Dkt. No. 392] and
4 the Complaint it filed in the Adversary, it is clear that OHP is familiar with the Azzure claim and
5 Azzure's assertion that the First Statement was assigned to it.

6 On July 6, 2021, CT Corp, as agent for Cobalt, filed a UCC-1 Statement No.
7 U210062497027 against the Debtor with the California Secretary of State ("Second Statement"). A
8 copy of the Second Statement was attached to the Motion as Exhibit 6. While the Second Statement
9 does not identify Cobalt as the holder of the Second Statement, the Trustee confirmed that Cobalt
10 had CT Corp file the Second Statement through a production of documents from CT Corp pursuant a
11 subpoena issued pursuant to Fed. R. Bankr. P. 2004 [Dkt. No. 445]. A true and correct copy of a
12 document identifying Cobalt as the holder of the Second Statement that was produced by CT Corp is
13 attached as Exhibit 1.

14 The Motion is clear that the Second Statement is "separate from the financing statement that
15 Cobalt assigned to Bae and which Bae assigned to Azzure" i.e. the First Statement. (Motion, Page
16 6). The Motion is also clear that it only seeks the authority to file a termination statement for the
17 Second Statement and not the First Statement which is at issue in the Adversary. The Motion drew a
18 clear distinction between the First Statement and the Second Statement.

19 OHP states that it filed its Response because (i) the Trustee was wrong in the Motion to say
20 that Cobalt had filed two UCC-1 statements against the Debtor because supposedly Trustee only
21 showed one financing statement from Cobalt in Trustee's Sale Motion, pointing to Dkt. No. 191 at
22 pg. 34 and (ii) informing the Court and the Trustee that it had no objection to the Trustee's
23 "termination of Cobalt's lien[.]" Both of OHP's statements are addressed below.

24 Trustee's Sale Motion to which OHP refers did, in fact, include two UCC-1 statements. As
25 shown in the table in Exhibit 2, on pg. 35 line 3 of the Sale Motion, Trustee listed CT Corp filing
26 U210050853928. On lines 15-17, four rows below, Trustee listed CT Corp filing U210062497027.
27 See Exhibit 2. Trustee informed the Court of both UCC financing statements filed by CT Corp on
28 behalf of Cobalt as soon as Trustee found them as part of his investigation into potential secured

1 claims against Debtor's estate.

2 To OHP's second point: "the termination of Cobalt's lien" is not the exact relief requested in
3 the Motion. Rather, the Motion seeks to value the secured claim of Cobalt at \$0.00 for plan purposes
4 and requests the authority to terminate the Second Statement if Cobalt doesn't first terminate it. In
5 fact, Cobalt already released the Second Statement as evidenced on the attached Exhibit 3.

6 **CONCLUSION**

7 Because the Response fails to present any grounds for the Court to deny the Motion, the
8 Trustee respectfully requests that the Court enter an order granting the Motion.

9
10 Dated: February 21, 2024

MARSHACK HAYS WOOD LLP

11 /s/ D. Edward Hays

12 BY: _____

D. EDWARD HAYS

13 ALINA N. MAMLYUK

14 Attorneys for Chapter 11 Trustee

RICHARD A. MARSHACK

Order #:	81323933
Client #:	54309 COBALT FUNDING SOLUTIONS LLC
OC Order #:	
Expires:	06-JUL-2026 - Original

OC Order #:	Line #
Debtor Debtor/Secured Party	
1. THE LITIGATION PRACTICE GROUP PC	
2. VULCAN CONSULTING GROUP LLC	
3. BAT INC	
4. THE LITIGATION PRACTICE GROUP PC	
5. VULCAN CONSULTING	
6. COAST PROCESSING.COM d/b/a COAST PROCESSING	
7. MARCH, DANIEL STEPHEN	
8. DIAB, TONY M	
9. DIAB, TONY M	
Secured Party	
1. C.T. Corporation System, as representative	

Misc. Info		
Routing Status:	Ready To Invoice	
Billing Status:	INVOICED	
Current Location:	Invoice	
Addendum PageCount:	0	
Attachments:		
Att.Method: None Pg#: 0 Fixture: N PMSI: N STR: N Origin: iLien		
Submitted by:	NICOLE HASSAN 316749	
LienRef:	79695303 UDS#:	
Jurisdiction(USA)	File#	File Date
CA000 Secretary of State	U210062497027	07/06/2021

Q&A

Case 8:23-bk-10571-SC Doc 191 Filed 07/07/23 Entered 07/07/23 21:44:24 Desc
Main Document Page 35 of 44

Creditor	UCC No.	Status	Filing Date	Lapse Date	Scope	Claim Amount if Known
CT CORPORATION (SYSTEM) CORP.	U210050853928	ACTIVE	5/28/2021	5/28/2026	All Assets Filing	
CORPORATION SERVICE COMPANY, AS REPRESENTATIVE - SPRINGFIELD, IL	U210052792122	ACTIVE	6/4/2021	6/4/2026	All Assets Filing	
C T CORPORATION SYSTEM, AS REPRESENTATIVE - GLENDALE, CA	U210057670018	ACTIVE	6/17/2021	6/17/2026	All Assets Filing	
WORLD GLOBAL FUNDLLC - BROOKLYN, NY	U210059750525	ACTIVE	6/24/2021	6/24/2026	"All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents, chattel paper, licenses, leases and general intangibles, whether now owned acquired or arising, and all of the debtor's books and records relating to any of the foregoing."	
C T CORPORATION SYSTEM, AS REPRESENTATIVE [unknown as to who they represent]	U210062497027	ACTIVE	7/6/2021	7/6/2026	All Assets Filing	
BMF ADVANCE - BROOKLYN, NY	U210090322021	ACTIVE	10/4/2021	10/4/2026	All Assets Filing	
DIVERSE CAPITAL	U210106788229 and U210085288536	ACTIVE	12/1/2021	12/1/2026	"All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents chattel paper, licenses, leases and general intangibles, whether now owned acquired or arising, and all of debtor's books and records relating to any of the foregoing."	Debtor Scheduled at \$1,224,810.00 on Schedule D
Fundura Capital Group 80 Broad Street, Suite 3303 New York, NY 10004						Debtor Scheduled at \$2,100,000.00 on Schedule D

DMWEST #16291513 v4



U240005700818



STATE OF CALIFORNIA
Office of the Secretary of State
**UCC FINANCING STATEMENT AMENDMENT (UCC
3)**

California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File No.: U240005700818

Date Filed: 1/24/2024

Submitter Information:

Contact Name	WOLTERS KLUWER LIEN SOLUTIONS
Organization Name	LIEN SOLUTIONS
Phone Number	800-331-3282
Email Address	uccfilingreturn@wolterskluwer.com
Address	P.O. BOX 29071 GLENDALE, CA 912099071

Amendment Action Information:

Initial Financing Statement File Number	U210062497027
Date Filed	07/06/2021
Amendment Action	Termination

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name	C T Corporation System, as representative
--------------------------------	-------------------------------------------

Optional Filer Reference Information:

97044390

B2438-5041 01/24/2024 10:39 AM Received by California Secretary of State

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **TRUSTEE'S REPLY TO RESPONSE OF OHP-CDR, LP AND PURCHASECO 80, LLC RE: MOTION TO DETERMINE AMOUNT OF SECURED CLAIMS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 21, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On , I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR – MAIL REDIRECTED TO TRUSTEE

THE LITIGATION PRACTICE GROUP P.C.
17542 17TH ST, SUITE 100
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 21, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 21, 2024
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Bradford Barnhardt	bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
ATTORNEY FOR CREDITOR AFFIRMA, LLC and CREDITOR OXFORD KNOX, LLC	Eric Bensamochan	eric@eblawfirm.us, G63723@notify.cincompass.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Peter W Bowie	peter.bowie@dinsmore.com, caron.burke@dinsmore.com
ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC	Ronald K Brown	ron@rkbrownlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Christopher Celentino	christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
INTERESTED PARTY COURTESY NEF	Shawn M Christianson	cmcintire@buchalter.com, schristianson@buchalter.com
INTERESTED PARTY COURTESY NEF	Randall Baldwin Clark	rbc@randallbclark.com
ATTORNEY FOR DEFENDANT LISA COHEN and DEFENDANT ROSA BIANCA LOLI:	Leslie A Cohen	leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; clare@lesliecohenlaw.com
INTERESTED PARTY COURTESY NEF	Aaron E. DE Leest	adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
INTERESTED PARTY COURTESY NEF	Anthony Paul Diehl	anthony@apdlaw.net, Diehl.AnthonyB112492@notify.bestcase.com, ecf@apdlaw.net
ATTORNEY FOR INTERESTED PARTY NATIONAL ASSOCIATION OF CONSUMER BANKRUPTCY ATTORNEYS and INTERESTED PARTY NATIONAL CONSUMER BANKRUPTCY RIGHTS CENTER	Jenny L Doling	jd@jdl.law, dolingjr92080@notify.bestcase.com; 15994@notices.nextchapterbk.com; jdoling@jubileebk.net
ATTORNEY FOR CREDITOR CAROLYN BEECH	Daniel A Edelman	dedelman@edcombs.com, courtecl@edcombs.com
CREDITOR	Meredith Fahn	fahn@sbcglobal.net
ATTORNEY FOR CREDITOR VALIDATION PARTNERS LLC	William P Fennell	william.fennell@fennelllaw.com, luralene.schultz@fennelllaw.com; wpf@ecf.courtdrive.com; hal.a.hammi@fennelllaw.com; naomi.cwalinski@fennelllaw.com; s.amantha.larimer@fennelllaw.com
ATTORNEY FOR DEFENDANT CLEAR VISION LLC dba LIBERTY1 FINANCIAL	Marc C Forsythe	mcforsythe@goeforlaw.com, mforsythe@goeforlaw.com; dcyrankowski@goeforlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jeremy Freedman	jeremy.freedman@dinsmore.com, nicollette.murphy@dinsmore.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

ATTORNEY FOR CREDITOR HERRET CREDIT	Eric Gassman	erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Christopher Ghio	christopher.ghio@dinsmore.com, nicolette.murphy@dinsmore.com;angelica.urena@dinsmore. com;deamira.romo@dinsmore.com
ATTORNEY FOR CREDITOR AMY GINSBURG; CREDITOR KENTON COBB; and CREDITOR SHANNON BELLFIELD	Amy Lynn Ginsburg	efilings@ginsburglawgroup.com
ATTORNEY FOR DEFENDANT STRIPE, INC	Eric D Goldberg	eric.goldberg@dlapiper.com, eric-goldberg- 1103@ecf.pacerpro.com
ATTORNEY FOR CREDITOR AFFIRMA, LLC; CREDITOR ANAHEIM ARENA MANAGEMENT, LLC; CREDITOR ANAHEIM DUCKS HOCKEY CLUB, LLC; and CREDITOR OXFORD KNOX, LLC	Jeffrey I Golden	jgolden@go2.law, kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken @wgllp.com;dfitzgerald@go2.law;golden.jeffreyi.b117954@n otify.bestcase.com
ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC	Richard H Golubow	rgolubow@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com
ATTORNEY FOR CREDITOR UNITED PARTNERSHIPS, LLC	David M Goodrich	dgoodrich@go2.law, kadele@go2.law;dfitzgerald@go2.law;wgllp@ecf.courtdrive. com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	D Edward Hays	ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cme ndoza@marshackhays.com;cmendoza@ecf.courtdrive.com
ATTORNEY FOR CREDITOR CITY CAPITAL NY	Alan Craig Hochheiser	ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC	Garrick A Hollander	ghollander@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com
ATTORNEY FOR CREDITOR SHARP ELECTRONICS CORPORATION	Brian L Holman	b.holman@musickeeler.com
INTERESTED PARTY COURTESY NEF	Richard L. Hyde	richard@amintalati.com
ATTORNEY FOR INTERESTED PARTY MERCHANTS CREDIT CORPORATION	Peter L Isola	pisola@hinshawlaw.com
ATTORNEY FOR CREDITOR, PLAINTIFF, and COUNTER- DEFENDANT OHP-CDR, LP and PLAINTIFF and COUNTER-DEFENDANT PURCHASECO 80, LLC	Razmig Izakelian	razmigizakelian@quinnemanuel.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

ATTORNEY FOR FIDELITY NATIONAL INFORMATION SERVICES, INC. DBA FIS	Sweeney Kelly	kelly@ksgklaw.com
ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.	Joon M Khang	joon@khanglaw.com
ATTORNEY FOR INTERESTED PARTY AD HOC CONSUMER CLAIMANTS COMMITTEE	Ira David Kharasch	ikharasch@pszjlaw.com
ATTORNEY FOR DEFENDANT GALLANT LAW GROUP	Meredith King	mking@fsl.law , ssanchez@fsl.law ; jwilson@fsl.law
ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS	Nicholas A Koffroth	nkoffroth@foxrothschild.com , khoang@foxrothschild.com
ATTORNEY FOR DEFENDANT MARICH BEIN, LLC	David S Kupetz	David.Kupetz@lockelord.com , mylene.ruiz@lockelord.com
INTERESTED PARTY COURTESY NEF	Christopher J Langley	chris@slclawoffice.com , omar@slclawoffice.com ; langleycr75251@notify.bestcase.com ; ecf123@casedriver.com ; john@slclawoffice.com
ATTORNEY DEFENDANT OPTIMUMBANK HOLDINGS, INC	Matthew A Lesnick	matt@lesnickprince.com , matt@ecf.inforuptcy.com ; jmack@lesnickprince.com
ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, P.C.; DEFENDANT LGS HOLDCO, LLC; INTERESTED PARTY CONSUMER LEGAL GROUP, P.C.; and INTERESTED PARTY LIBERTY ACQUISITIONS GROUP INC	Daniel A Lev	daniel.lev@gmlaw.com , cheryl.caldwell@gmlaw.com ; dlev@ecf.courtdrive.com
ATTORNEY FOR INTERESTED PARTY REVOLV3, INC.	Britteny Leyva	bleyva@mayerbrown.com , 2396393420@filings.docketbird.com ; KAWhite@mayerbrown.com ; ladoCKET@mayerbrown.com
INTERESTED PARTY COURTESY NEF ADVERSARY PROCEEDING #: 8:23-AP-01148-SC	Marc A Lieberman	marc.lieberman@flpllp.com , safa.saleem@flpllp.com ; addy@flpllp.com
ATTORNEY FOR CREDITOR PHILLIP A GREENBLATT, PLLC	Michael D Lieberman	mlieberman@lipsonneilson.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Yosina M Lissebeck	Yosina.Lissebeck@Dinsmore.com , caron.burke@dinsmore.com
ATTORNEY FOR CREDITOR FUNDURA CAPITAL GROUP	Mitchell B Ludwig	mb1@kpclegal.com , kad@kpclegal.com
INTERESTED PARTY AND ATTORNEY	Daniel S March	marchlawoffice@gmail.com , marchdr94019@notify.bestcase.com
ATTORNEY FOR CREDITOR and DEFENDANT GREYSON LAW CENTER PC, CREDITOR and DEFENDANT HAN TRINH; and CREDITOR and DEFENDANT PHUONG (JAYDE) TRINH	Kathleen P March	kmarch@bkylawfirm.com , kmarch3@sbcglobal.net ; kmarch@sbcglobal.net

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

ATTORNEY FOR CREDITOR DAVID ORR	Mark J Markus	bklawr@bklaw.com, markjmarkus@gmail.com;markus.markj.r112926@notify.best case.com
CHAPTER 11 TRUSTEE	Richard A Marshack (TR)	pkraus@marshackhays.com, rmarshack@iq7technology.com;ecf.alert+Marshack@titlexi.c om
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Laila Masud	lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Sarah S. Mattingly	sarah.mattingly@dinsmore.com
INTERESTED PARTY COURTESY NEF	William McCormick	Bill.McCormick@ag.tn.gov
ATTORNEY FOR US TRUSTEE	Kenneth Miskin	Kenneth.M.Miskin@usdoj.gov
INTERESTED PARTY COURTESY NEF	Byron Z Moldo	bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com,dperez@ecjlaw.com
ATTORNEY FOR CREDITOR ADP, INC	Glenn D. Moses	gmoses@venable.com, cascavone@venable.com;ipmalcolm@venable.com;jadelgad o@venable.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jamie D Mottola	Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
INTERESTED PARTY COURTESY NEF	Alan I Nahmias	anahmias@mbn.law, jdale@mbn.law
INTERESTED PARTY COURTESY NEF	Victoria Newmark	vnewmark@pszilaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jacob Newsum- Bothamley	jacob.bothamley@dinsmore.com, angelica.urena@dinsmore.com;deamira.romo@dinsmore.co m
ATTORNEY FOR US TRUSTEE CREDITOR	Queenie K Ng	queenie.k.ng@usdoj.gov
ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS	Israel Orozco	israel@iolawcorp.com
ATTORNEY FOR DEFENDANT OPTIMUMBANK HOLDINGS, INC.	Lisa Patel	patel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC	Michael R Pinkston	rpinkston@seyfarth.com, jmcdermott@seyfarth.com,sfocalendar@seyfarth.com,53145 22420@filings.docketbird.com,bankruptcydocket@seyfarth.c om
ATTORNEY FOR DEFENDANT SCOTT JAMES EADIE	Douglas A Plazak	dplazak@rhlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Tyler Powell	tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;rosetta.mitchell@dinsmore.c om

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

ATTORNEY FOR DEFENDANT TOUZI CAPITAL, LLC and DEFENDANT ENG TAING	Daniel H Reiss	dhr@lnbyg.com, dhr@ecf.inforuptcy.com
ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, PC	Ronald N Richards	ron@ronaldrichards.com, 7206828420@filings.docketbird.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Vanessa Rodriguez	vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC	Kevin Alan Rogers	krogers@wellsmar.com
ATTORNEY FOR CREDITOR MARI AGAPE	Gregory M Salvato	gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC	Olivia Scott	olivia.scott3@bclplaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jonathan Serrano	jonathan.serrano@dinsmore.com
ATTORNEY FOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC	Maureen J Shanahan	Mstotaro@aol.com
ATTORNEY FOR CREDITORS UNITED PARTNERSHIPS, LLC and MNS FUNDING LLC	Paul R Shankman	PShankman@fortislaw.com, info@fortislaw.com
ATTORNEY FOR INTERESTED PARTY MORNING LAW GROUP, PC	Zev Shechtman	zs@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com
ATTORNEY FOR US TRUSTEE	Leslie Skorheim	leslie.skorheim@usdoj.gov
ATTORNEY FOR CREDITOR PIONEER FUNDING GROUP, LLC	Adam D Stein-Sapir	info@pflc.com
ATTORNEY FOR DEFENDANT BANKUNITED, N.A.	Howard Steinberg	steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
ATTORNEY FOR CREDITOR ALTERYX, INC.	Andrew Still	astill@swlaw.com, kcollins@swlaw.com
ATTORNEY FOR CREDITOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC and INTERESTED PARTY RANDALL BALDWIN CLARK	Michael R Totaro	Ocbkatty@aol.com
US TRUSTEE	United States Trustee (SA)	ustpreion16.sa.ecf@usdoj.gov
ATTORNEY FOR WITNESS BRADFORD LEE 8:23-ap-01046- SC	William J Wall	wwall@wall-law.com

ATTORNEY FOR CREDITOR and DEFENDANT AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC	Sharon Z. Weiss	sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.c om
ATTORNEY FOR CREDITOR DEBT RELIEF GROUP, LLC	Johnny White	JWhite@wrslawyers.com, jlee@wrslawyers.com

4863-6938-1031